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UNITED STATES DISTRICT COURT
DISTRICT OF NEVADA

TAMMIE KEITH-HENDERSON,

Plaintiff,

v.

CLARK COUNTY SCHOOL DISTRICT,

Defendants.

CASE NO.: 2:19-cv-01448-RFB-DJA

**STIPULATION AND ORDER TO
EXTEND TIME FOR DEFENDANT TO
RESPOND TO PLAINTIFF'S
COMPLAINT**

[FIRST REQUEST]

Plaintiff Tammie Keith-Henderson and Defendant Clark County School District, by and through their respective attorneys of record, hereby stipulate to extend the time for Defendant to file a response to Plaintiff's Complaint (ECF No. 1) from the current deadline of September 13, 2019 for seven (7) days, up to and including **September 20, 2019**. This is the first request for an extension of time to respond to Plaintiff's Complaint.

Defendant seeks the extension of time to allow sufficient time to prepare an appropriate response to the Complaint. Plaintiff served Defendant with process on August 23, 2019, rendering a response due on September 13, 2019. Fed. R. Civ. P. 12. Because this is Plaintiff's second lawsuit against Defendant and the former was fully adjudicated in Defendant's favor (Case No.: 2:17-cv-01767-JAD-NJK), counsel requires additional time to evaluate and address potential res judicata and collateral estoppel concerns. Further, Defendant's counsel will be out of the country through September 15, 2019 and unable to properly evaluate and prepare a response by the current responsive deadline.

1 Based on the foregoing, the parties hereby stipulate to a short extension of time, until
2 September 20, 2019, for Defendant County School District to respond to the Complaint. The one
3 (1) week extension to answer or otherwise response to the Complaint will have no significant or
4 prejudicial impact on the proceedings.

5 This request is made in good faith and not for the purpose of delay.

6 Dated: September 6, 2019

Dated: September 6, 2019

7 LAW OFFICE OF DAN M. WINDER P.C.

CLARK COUNTY SCHOOL DISTRICT
OFFICE OF THE GENERAL COUNSEL

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9 By: /s/ Dan M. Winder

Dan. M. Winder, Esq. (#1569)
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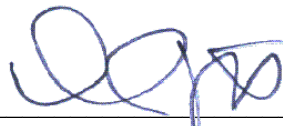
By: /s/ Crystal J. Herrera

Crystal J. Herrera (#12396)
5100 West Sahara Avenue
Las Vegas, Nevada 89146
Attorney for Defendant

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13 **ORDER**

14 **IT IS SO ORDERED.**

15 DATED: September 9, 2019.

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18 Daniel J. Albregts
19 United States Magistrate Judge
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